

The Atlantic Foundation

April 2, 2024

BY ECF

The Honorable Katherine H. Parker
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Thompson v. City of New York, et al.
Southern District of New York, No. 1:22-cv-1458 (JPO) (KHP)

Dear Judge Parker:

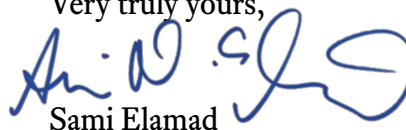
As *pro bono* counsel, I write on behalf of Plaintiff Kwaine Thompson, pursuant to Your Honor's Individual Rules of Practice, to request permission to file certain exhibits under seal on a temporary basis as part of Plaintiff's response/opposition to Defendants' motion for summary judgment. Plaintiff's response is due by Friday, April 5, 2024. Specifically, Plaintiff seeks to file medical records, as well as excerpts from the City's various internal investigations related to his allegations of sexual abuse, both of which are redacted in Defendants' motion. *See, e.g.*, ECF No. 85-6 (medical records) & 85-9 (investigation report). Also, some of these materials were designated as confidential under the parties' existing confidentiality order.

Importantly, Plaintiff does not believe that the exhibits should remain under seal indefinitely since redaction is sufficient. However, given Plaintiff's nearing deadline (Apr. 5), there is not enough time for counsel to make the necessary redactions. Although, once the motion is briefed or at any later point, Plaintiff is happy to file redacted versions and defers to the Court.

Defendants do not have any objection with respect to the medical records; they do not take any position with respect to the investigation-related records.

Thank you very much. I sincerely appreciate the Court's attention to this matter.

Very truly yours,


Sami Elamad